

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CAROL ALVAREZ,

Plaintiff,

CASE NO.: 1:24-CV-24135-JEM

v.

GOAT HOSPITALITY GROUP LLC,
and WGOAT15 LLC,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff, CAROL ALVAREZ, by and through undersigned counsel, hereby respectfully moves this Court for a 21-day extension of time to file her response to Defendants' Motion to Dismiss Plaintiff's Amended Complaint [ECF No. 16], and in support states as follows:

1. On April 11, 2025, Defendants filed their Motion to Dismiss Plaintiff's Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.
2. Plaintiff's current deadline to respond to the Motion to Dismiss is April 25, 2025.
3. Federal Rule of Civil Procedure 6(b)(1)(A) allows the Court to extend the deadline for good cause shown. FED. R. CIV. P. 6(b)(1)(A).
4. Plaintiff respectfully requests a 21-day extension of time, up to and including May 16, 2025, to allow Plaintiff sufficient time to evaluate the legal and factual issues raised in Defendants' Motion, and to ensure that that her response is thorough, accurate, and helpful to the Court.
5. Good cause exists for the requested extension of time, as Plaintiff does not seek it for purposes of delay, but rather to ensure Plaintiff has adequate time to properly prepare her

response and to enable the Court to resolve the pending motion with the benefit of a complete and well-briefed record.

6. This is Plaintiff's first request for an extension in connection with this motion, and the requested extension will not prejudice any party. Moreover, this request is unopposed by the Defendants.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order extending the deadline to respond to Defendants' Motion to Dismiss the Amended Complaint [ECF No. 16], up to and including May 16, 2025, and granting such other relief as the Court deems just and proper.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), I hereby certify that undersigned counsel conferred with counsel for the Defendants, who advised that Defendants do not oppose the relief sought herein.

Dated this 18th day of April, 2025,

Respectfully submitted,

/s/ Kyle T. MacDonald
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on April 18, 2025, on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Kyle T. MacDonald
Kyle T. MacDonald, Esq.

SERVICE LIST

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